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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**LARRY BALCOM**, an individual, by and  
through his attorney-in-fact, **MARY**  
**BARNES**, an individual,

Plaintiffs,

v.

**CLINTON PETERSON** and **APRIL**  
**PETERSON**, a married couple, and  
**FORECLOSURE HELP, LLC**, an Idaho  
Limited Liability Company,

Defendants.

Case No. 3:23-cv-00528-SB

**DECLARATION OF TERRY**  
**SCANNELL IN SUPPORT OF**  
**PLAINTIFFS' THIRD MOTION TO**  
**EXTEND DISCOVERY DEADLINES**

I, Terry Scannell, being first duly and sworn, depose and say:

1. I am the founder and senior attorney of Scannellaw, LLC, counsel of record for the Plaintiffs. I am over the age of 18 and have knowledge of the facts stated herein and I am competent to testify concerning the same. The following information is provided in support of Plaintiffs Larry Balcom and Mary Barnes' Third Motion to Extend Discovery Deadlines.

2. The Plaintiffs requested bank records from Foreclosure Help, LLC, as well as from April and Clinton Peterson.

3. In our letter emailed to Counsel for Defendants on September 26, 2024, we outlined many still outstanding discovery requests including multiple pertaining to bank records. Financial records that were produced were heavily redacted and/or only showed a small snapshot in time in opposition to the length of statements we asked for.

4. On February 23, 2024, Counsel for Defendants stated that Defendants will not produce “any additional bank records.”

5. On May 22, 2024, Counsel for Defendants reiterated that they will not produce any bank records for April or Clinton.

DATED: May 22, 2024.

/s/ Terry Scannell  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was electronically filed with the Court using CM/ECF. I also certify that the foregoing document is being served this day via E-mail and the Electronic Filing Notice generated by CM/ECF on the parties listed below:

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*Attorney for Defendants*

DATED: Wednesday, May 22, 2024

/s/Terry Scannell  
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